

United States District Court for the
Western District of Washington

700 Stewart Street, Suite 2310
Seattle, WA 98101
(206) 370-8400

ANDREW U. D. STRAW,)	Case No.: 2:20-cv-00294-JLR
<i>Plaintiff,</i>)	
)	<u>Hon. James L. Robart</u>
v.)	Judge Presiding
)	Hon.
AVVO, INC.,)	<u>Magistrate Judge</u>
<i>Defendant.</i>)	Jury Trial Demanded

MOTION TO REOPEN AND FOR LEAVE TO AMEND COMPLAINT
TO BREACH OF CONTRACT

I, *plaintiff* Andrew U. D. Straw, make the following MOTION to reopen this matter and amend my COMPLAINT one time in the interest of justice, supported by the attached AFFIDAVIT OF PROTEST and 6 exhibits:

1. The attached AFFIDAVIT OF PROTEST provides reasons to allow me to request leave to reopen this matter to amend my COMPLAINT one time to make this about a breach of contract rather than a tort case, which it was originally.
2. Given the Statute of Limitations in the State of Washington allow an action on a written contract for 6 years after its breach, it is in the interest of justice to allow me to simply amend here rather than file a new lawsuit since the subject matter is so close to the original.

WHEREFORE, I move the Court to reopen this matter and allow me to amend my complaint one time and make this about breach of the TOS of Avvo, which required arbitration and Avvo avoided that arbitration by not paying the JAMS arbitration fee, causing JAMS not to provide that service. The dishonesty aspects provide equitable reasons to allow this as well, and these are explained in the attached AFFIDAVIT. It is in the interest of court efficiency that this be allowed here rather than going through the process of filing a separate lawsuit.

I, *plaintiff* Andrew U. D. Straw, verify that to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances and to the best of my knowledge, that the above statements and factual representations are true and correct on penalty of perjury. **July 16, 2025**

Respectfully submitted,

A handwritten signature in black ink that reads "Andrew U. D. Straw". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

s/ ANDREW U. D. STRAW
9169 W State St # 690
Garden City, ID 83714
Telephone: (847) 807-5237
andrew@andrewstraw.com

CERTIFICATE OF SERVICE

I, Andrew U. D. Straw, certify that I filed the above **MOTION TO REOPEN AND ALLOW ONE COMPLAINT AMENDMENT** with **AFFIDAVIT OF PROTEST** and **6 EXHIBITS** with the Clerk of this Court via CM/ECF on **July 16, 2025**, and this will be served to all counsel of record through that CM/ECF system. It will be available to the public via Pacer.gov.

Respectfully submitted,

A handwritten signature in black ink that reads "Andrew U. D. Straw". The signature is written in a cursive, flowing style.

s/ ANDREW U. D. STRAW, *Pro Se*
9169 W State St # 690
Garden City, ID 83714
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andrew@andrewstraw.com